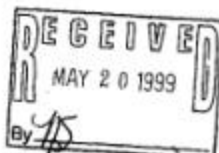




Dr. D. Clark Gibbs, Regulatory Official
TWRS-P Contractor
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A4-70
Richland, Washington 99352



99-RU-0315
99-RU-B-144

TWRS Privatization
3000 George Washington Way
Richland, WA 99352
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CCN #: 003192

May 17, 1999

Dear Dr. Gibbs:

**TWRS Privatization Contract No. DE-AC06-96RL13308 - W375 - AUTHORIZATION
BASIS AMENDMENT REQUEST REGARDING IDENTIFICATION OF
CONFIGURATION MANAGEMENT SUB-ORDINATE STANDARD**

- References:
- 1) RL/REG-98-09, Document, Dr. D. C. Gibbs, DOE/RL to Mr. M. Bullock, BNFL Inc., "Regulatory Unit Initial Safety Evaluation Report of the BNFL Inc. Initial Safety Assessment" dated March 1999.
 - 2) ABCN-W375-99-00035, Document, P. P. Lowry, BNFL Inc., to Distribution, *Authorization Basis Change Notice, "Revision to SRD Implementing Standard for Configuration Management"*, dated April 2, 1999.

In accordance with the requirements of RL/REG-97-13, Revision 5, this letter transmits the following Authorization Basis Amendment Request (ABAR-W375-99-00005) *Revision to SRD Implementing Standard for Configuration Management*, for U.S. Department of Energy Regulatory Unit (RU) approval. Included within the ABAR is the BNFL Inc. Safety Evaluation for this change.

This ABAR constitutes the response to ISER open item C.11: *Incomplete or Conflicting Elements of the Authorization Basis*, item 11. Subordinate standards for configuration management are not fully identified (Section 3.9.3.1, "Configuration Management").

Section 3.9.3.1, Configuration Management

The following open issues should be addressed during Part B:

- Identification of a subordinate standard beyond regulatory compliance for configuration management, which conveys more detailed expectation for the performance of work. (The RU Evaluation Report of the SRD accepts the Safety Criteria and/or Code of Federal Regulations as adequate conformance with the Top Level Standards for configuration management as-built and for change control.)

Dr. D. C. Gibbs
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May 17, 1999

CCN #: 003192

If you have any questions or if we can be of further assistance, please call me at (509)-371-3741 or Mr. D. A. Klein at (509)-371-3743.

Yours sincerely,



D. W. Edwards
Manager
Safety and Regulatory Programs

PPL/jca

Attachment: ABAR-W375-99-00003

cc:

Barr, R. w/a	DOE/RL	A4-70
Brown, N. w/a	DOE/RL	A0-21
Edwards, D.W. w/a	BNFL Inc.	MPF-B140
Kalman, G. w/a	DOE/RL	A4-70
Landry, W. w/a	BNFL Inc.	Fairfax
Lawrence, M. J. w/a	BNFL Inc.	MPF-A110
Morgan, S. w/a	BNFL Inc.	MPF-A116
PDC w/a	BNFL Inc.	ETC-1, Rm. 29
Rasmussen, P. w/a	DOE/RL	A7-80
Smyser, L. w/a	PNNL	A0-21
Tooze, R. w/a	BNFL Inc.	Fairfax